Table 1
Summary of IDW Stored at WVOW

Site ID	Description	Date(s) Generated	Soil Cuttings	Aqueous Wastes	Other Non- Indigenous IDW	Total
AOC-3	Pt Pleasant Landfill Leachate Monitoring Wells	Jun-95	47		1	48
Various AOCs	Areas of Concern	Apr-97		2		2
Data Gaps	Site-Wide Data Gaps	Dec-97	4			4
ESI-1	Magazine Area	Feb- to Mar-97	3	11	3	17
ESI-2	Acid Dock Area	1994 to Mar-95	8	13	1	22
ESI-3	Tract 21 Area	Mar-95	4			4
ESI-4	Red Water Outfall Sewer	Nov-94			2	2
ESI-9	Classification Yards	Mar-95 to Jan-96	44	62	2	108
LTMP	1997 Long Term Monitoring	Dec-97		87		87
OU-1	1993 - 1995 LTMP	Oct-93 to Oct-95	6	49	9	64
OU-10	South Acids Area	Jan-95		2		2
OU-11	Sellite Manufacturing Area	Feb- to Mar-94		6		6
OU-12	North & South Powerhouses	Feb- to Mar-95	3	. 3	2	8
OU-2	Red Water Reservoir	Jul- to Aug-95	16	1		17
OU-3	Yellow Water Reservoir	Jun-95 to Jun-96	28	14	1	43
OU-5	Pond 13 / Wet Wells	Jan- to Feb-95		2	2	4
OU-6	Ponds 7/11/21/23	Nov-94		3	1	4
OU-8	TNT Manufacturing Area	Oct-93 to Feb-94			8	8
OU-9	TNT Manufacturing Area	Sep-93	1	1		2
Supplementary LTMP	Site-Wide Data Gaps	Apr- to Dec-97	3	2		5
Unidentified			7	18	2	27
TOTAL			174	276	34	484

Table 2

# Summary of TCLP Results Monitoring Well Soil Cuttings

(Page 1 of 3)

Site ID			TCLP Res	sults		TCLP	Standards
	Well ID	Drum ID's	Parameter	Concentra (ug/L	. 1	(	(ug/L)
AOC3	PPLGW-008		Barium	945	<u>-</u>	100000	
	PPLGW-009		Barium	475		100000	
	PPLGW-010	1-P	Barium	356		100000	
	PPLGW-011	1-R	Barium	386		100000	
	PPLGW-012	1-J	Barium	227		100000	
	PPLGW-013	1-T	Barium	880		100000	
	İ		Carbon tetrachloride	29	i	57	wastewater
	PPLGW-008D	7-0	Barium	253		100000	
	PPLGW-009D	1-M, 2-M, 3-M, 4-M, 5-M, 6- M, 7-M, 8-M, 9-M, 10-M		335		100000	
	PPLGW-010D		Barium	379		100000	
	PPLGW-011D	1-S, 2-S, 3-S, 4-S, 5-S, 6-S, 7-S, 8-S, 9-S, 10-S		649		100000	
	PPLGW-012D	1-K, 2-K, 3-K, 4-K, 5-K, 6-K, 7-K, 8-K, 9-K, 10-K, 11-K	Barium	748		100000	
	PPLGW-013D	2-U, 2-U, 3-U, 4-U, 5-U, 6-U,	Barium	487		100000	
		7-U, 8-U, 9-U, 10-U, 11-U	Carbon tetrachloride	43			wastewater
	1	, 5,6 5,6 5, 10 5, 11 5	Chromium	13		5000	
ESI1	MZAGW-001	106-D, 107-D	Barium	534		100000	
	MZAGW-002	108-D	Barium	666		100000	
ESI2	ACDGW-001	37-B, 38-B, 39-B, 40-B, 41-		251		100000	
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	B, 42-B, 43-B, 113-D	Chloroform	6	,		wastewater
	ACDGW-002	113-D	2-Butanone	8			wastewater
			Barium	768		100000	
	1		Chromium	16.1		5000	
ESI3	T21GW-001	127-D, 128-D	2-Butanone	7.	J	280	wastewater
		·	Barium	551		100000	
			Chromium	12.4		5000	
			Trichloroethene	184			
	T21GW-002	25-E, 26-E	2-Butanone	6	J	280	wastewater
	İ		Barium	998		100000	
			Chromium	15.9		5000	
•			Trichloroethene	7	J		
ŀ	T21GW-003	All soils disposed of off-site		29		280	wastewater
		by USACE Huntington	Barium	470		100000	
		District (1 drum)	Trichloroethene	821			
ESI9	MCYGW-001	1-BC, 1-BC, 2-BC	Barium	401		100000	
	MCYGW-002	1-BB, 2-BB, 3-BB	Barium	565		100000	
	MCYGW-002D		Barium	248		100000	
	NAAGW-001	2-BD, 9-I	Barium	954		100000	
			Chromium	32.2		5000	

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Table 2

# Summary of TCLP Results Monitoring Well Soil Cuttings

(Page 2 of 3)

Site ID			TCLP Re	sults	TCLP	Standards
	Well ID	Drum ID's	Parameter	Concentration (ug/L)		(ug/L)
ESI-9 (continued)	NAAGW-001D	1-BD, 3-BD, 4-BD, 5-BD, 7- BD, 9-BD, 1-BE, 2-BE, 3- BE, 3-BE, 4-BE, 5-BE, 6-BE, 7-BE, 8-BE, 10-BE, 11-BE, 12-BE, 13-BE, 14-BE, 16- BE		603	100000	
	PPLGW-014	1-BG, 1-BG, 2-BG, 2-BG, 3- BG	Barium	222	100000	
	SELGW-005	1-BF	Barium Chromium	226 21.3	100000 5000	
OU12	NPHGW-002		Barium Chloroform Lead	528 5 J 273	100000 46 5000	wastewater
	NPHGW-002D		Barium 2-Butanone	553 8 J	100000	wastewater
	SPHGW-001		Barium Cadmium	272	100000	wastewater
	SPHGW-001D	82-B, 84-B	Barium	418	100000	
OU-2	RWRGW-002 RWRGW-003	1-Y 1-AA	Barium Barium	1180	100000 100000	
	RWRGW-004	1-X	Trichloroethene Barium	6 J 1000	100000	
	RWRGW-002D RWRGW-003D		Barium None Detected	828	100000	
	RWRGW-004D	5-Z, 6-Z, 7-Z 1-W	Barium Carbon tetrachloride	860 8 J	100000 57	wastewater
OU-3	SAAGW-001D	1-l, 1-l, 2-l, 3-l, 4-l, 5-l, 6-l, 8 l	Tetrachloroethene 2,4-Dinitrotoluene 2-Butanone Barium	8 J 40 26 J 1170		wastewater wastewater
	YWRGW-002	1-H	Barium Chromium	143 B 52	100000 5000	
	YWRGW-002D	1-G, 2-G, 3-G, 4-G, 5-G, 6- G, 7-G, 8-G, 9-G, 10-G, 11- G, 12-G, 13-G, 14-G, 17-G, 18-G		331	100000	
OU6	W07GW-002		2-Butanone Barium	33 J 102	280 100000	wastewater
	W11GW-001		2-Butanone Barium	37 J 556		wastewater
	W21GW-003		2-Butanone Barium	47 J 1300		wastewater

#### Table 2

# Summary of TCLP Results Monitoring Well Soil Cuttings

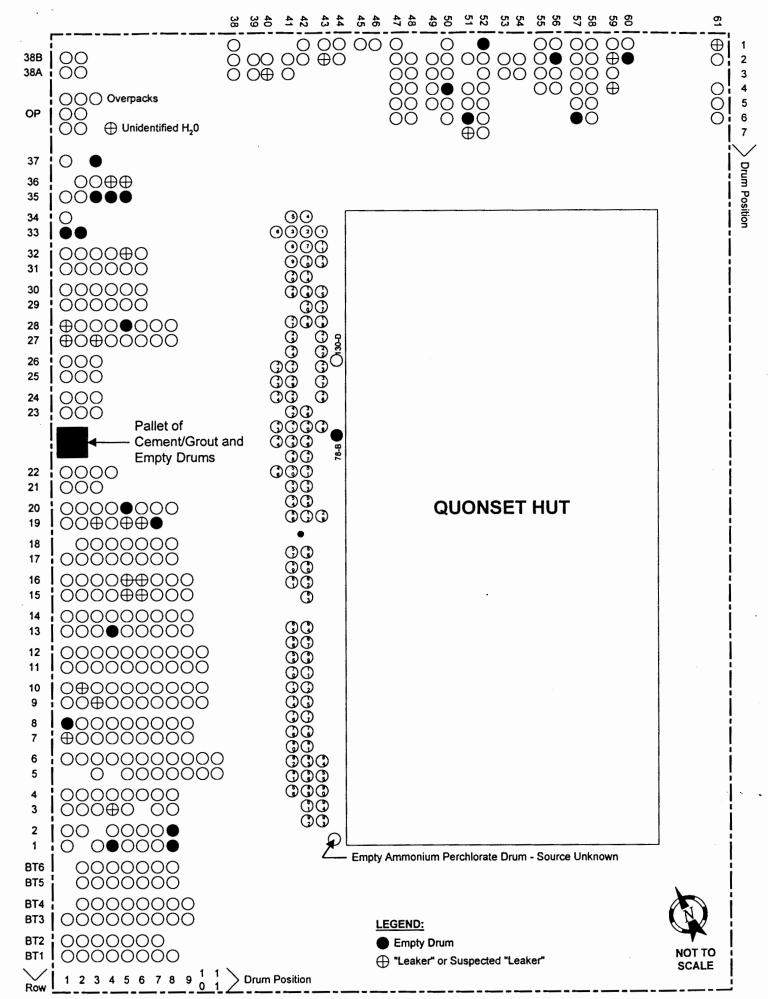
(Page 3 of 3)

Site ID		-	TCLPR	lesuits	TCLP Standards	
	Well ID	Drum ID's	Parameter	Concentration (ug/L)	(ug/L)	
OU-6	W23GW-004		2-Butanone	36 J	280 wastewater	
(continued)			Barium	576	100000	
			Selenium	127	5700	
Data Gaps	PWSGW-001	59, 60	None Detected			
	PWSGW-002A	57, 58	None Detected			
Supplementary LTMP	PWSGW-003	61, 62, 63	None Detected			

### **ATTACHMENT 1**

INVESTIGATION DERIVED WASTE INVENTORY & LOCATION MAP WEST VIRGINIA ORDNANCE WORKS

MASON COUNTY, WEST VIRGINIA



1	oty Drum
22   E	oty Drum
22   D	oty Drum
26 E         1         5         ESI3         T21GW-002         Soil Cuttings         03/25/95           127 D         1         6         ESI3         T21GW-001         Soil Cuttings         03/23/95           25 E         1         7         ESI3         T21GW-002         Soil Cuttings         03/25/95           114 D         1         8         ESI2         PASGW-002         Purge Water         03/12/95 Leaker - Emp           1 P         2         1         AOC3         PPLGW-010         Soil Cuttings         06/14/95           38 E         2         2         ESI9         Baker Tank         Decon Water         03/24/95           121 D         2         4         ESI2         PASGW-002         Purge Water         1994           136 D         2         5         ESI2         ACDGW-002         Decon Water         03/24/95           128 D         2         6         ESI3         T21GW-001         Soil Cuttings         03/23/95           116 D         2         7         ESI2         PASGW-002         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95      <	oty Drum
127   D	
25   E	
114 D         1         8         ESI2         PASGW-002         Purge Water         03/12/95         Leaker - Emp           1 P         2         1         AOC3         PPLGW-010         Soil Cuttings         06/14/95         06/14/95           38 E         2         2         ESI9         Baker Tank         Decon Water         03/24/95           121 D         2         4         ESI2         PASGW-002         Purge Water         1994           136 D         2         5         ESI2         ACDGW-002         Decon Water         03/28/95           128 D         2         6         ESI3         T21GW-001         Soil Cuttings         03/28/95           116 D         2         7         ESI2         PASGW-002         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           112 E         3         1         ESI9         Baker Tank         Decon Water         03/24/95           14 E         3         2         ESI9         Baker Tank         Decon Water	
1 P         2         1         AOC3         PPLGW-010         Soil Cuttings         06/14/95           38 E         2         2         ESI9         Baker Tank         Decon Water         03/24/95           121 D         2         4         ESI2         PASGW-002         Purge Water         1994           136 D         2         5         ESI2         ACDGW-002         Decon Water         03/28/95           128 D         2         6         ESI3         T21GW-001         Soil Cuttings         03/23/95           116 D         2         7         ESI2         PASGW-002         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           14 E         3         2         ESI9         Baker Tank         Decon Water         03/24/95           14 E         3         2         ESI9         Baker Tank         Decon Water         03/24/95           1	
38 E         2         2         ESI9         Baker Tank         Decon Water         03/24/95           121 D         2         4         ESI2         PASGW-002         Purge Water         1994           136 D         2         5         ESI2         ACDGW-002         Decon Water         03/28/95           128 D         2         6         ESI3         T21GW-001         Soil Cuttings         03/23/95           116 D         2         7         ESI2         PASGW-002         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           112 E         3         1         ESI9         Baker Tank         Decon Water         03/24/95           11 E         3         2         ESI9         Baker Tank         Decon Water         03/24/95           12 E         3         4         ESI9         Baker Tank         Decon Water         03/24/95           20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95	oty Drum
121 D         2         4         ESI2         PASGW-002         Purge Water         1994           136 D         2         5         ESI2         ACDGW-002         Decon Water         03/28/95           128 D         2         6         ESI3         T21GW-001         Soil Cuttings         03/23/95           116 D         2         7         ESI2         PASGW-002         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           16 E         3         1         ESI9         Baker Tank         Decon Water         03/24/95           14 E         3         2         ESI9         Baker Tank         Decon Water         03/24/95           11 E         3         3         ESI9         Baker Tank         Decon Water         03/24/95           12 E         3         4         ESI9         Baker Tank         Decon Water         03/24/95           20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95           1	oty Drum
136 D         2         5         ESI2         ACDGW-002         Decon Water         03/28/95           128 D         2         6         ESI3         T21GW-001         Soil Cuttings         03/23/95           116 D         2         7         ESI2         PASGW-002         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           16 E         3         1         ESI9         Baker Tank         Decon Water         03/24/95           14 E         3         2         ESI9         Baker Tank         Decon Water         03/24/95           11 E         3         3         ESI9         Baker Tank         Decon Water         03/24/95           12 E         3         4         ESI9         Baker Tank         Decon Water         03/24/95           12 E         3         5         ESI9         Baker Tank         Decon Water         03/24/95           20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95           17 E         3         8         ESI9         Baker Tank         Decon Water         03/24/95           <	oty Drum
128 D         2         6         ESI3         T21GW-001         Soil Cuttings         03/23/95           116 D         2         7         ESI2         PASGW-002         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95           16 E         3         1         ESI9         Baker Tank         Decon Water         03/24/95           14 E         3         2         ESI9         Baker Tank         Decon Water         03/24/95           11 E         3         3         ESI9         Baker Tank         Decon Water         03/24/95           12 E         3         4         ESI9         Baker Tank         Decon Water         03/24/95           12 E         3         4         ESI9         Baker Tank         Decon Water         03/24/95           20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95           17 E         3         8         ESI9         Baker Tank         Decon Water         03/24/95           18 E         4         1         ESI9         Baker Tank         Decon Water         03/24/95           <	oty Drum
116 D         2         7         ESI2         PASGW-002         Purge Water         03/12/95           112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95         Leaker - Emp           16 E         3         1         ESI9         Baker Tank         Decon Water         03/24/95         Decon	oty Drum
112 D         2         8         ESI2         PASGW-001         Purge Water         03/12/95 Leaker - Empth	oty Drum
16 E         3         1         ESI9         Baker Tank         Decon Water         03/24/95           14 E         3         2         ESI9         Baker Tank         Decon Water         03/24/95           11 E         3         3         ESI9         Baker Tank         Decon Water         03/24/95           12 E         3         4         ESI9         Baker Tank         Decon Water         03/24/95           23 E         3         5         ESI9         Baker Tank         Decon Water         03/24/95           20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95           17 E         3         8         ESI9         Baker Tank         Decon Water         03/24/95           18 E         4         1         ESI9         Baker Tank         Decon Water         03/24/95           2 E         4         2         ESI9         Baker Tank         Decon Water         03/24/95           13 E         4         3         ESI9         Baker Tank         Decon Water         03/24/95           24 E         4         5         ESI9         Baker Tank         Decon Water         03/24/95	
14 E         3         2         ESI9         Baker Tank         Decon Water         03/24/95           11 E         3         3         ESI9         Baker Tank         Decon Water         03/24/95           12 E         3         4         ESI9         Baker Tank         Decon Water         03/24/95           23 E         3         5         ESI9         Baker Tank         Decon Water         03/24/95           20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95           17 E         3         8         ESI9         Baker Tank         Decon Water         03/24/95           18 E         4         1         ESI9         Baker Tank         Decon Water         03/24/95           2 E         4         2         ESI9         Baker Tank         Decon Water         03/24/95           13 E         4         3         ESI9         Baker Tank         Decon Water         03/24/95           15 E         4         4         ESI9         Baker Tank         Decon Water         03/24/95           24 E         4         5         ESI9         Baker Tank         Decon Water         03/24/95	
11 E         3         3         ESI9         Baker Tank         Decon Water         03/24/95           12 E         3         4         ESI9         Baker Tank         Decon Water         03/24/95           23 E         3         5         ESI9         Baker Tank         Decon Water         03/24/95           20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95           17 E         3         8         ESI9         Baker Tank         Decon Water         03/24/95           18 E         4         1         ESI9         Baker Tank         Decon Water         03/24/95           2 E         4         2         ESI9         Baker Tank         Decon Water         03/24/95           13 E         4         3         ESI9         Baker Tank         Decon Water         03/24/95           15 E         4         4         ESI9         Baker Tank         Decon Water         03/24/95           24 E         4         5         ESI9         Baker Tank         Decon Water         03/24/95           19 E         4         7         ESI9         Baker Tank         Decon Water         03/24/95	
12 E         3         4         ESI9         Baker Tank         Decon Water         03/24/95 Leaker           23 E         3         5         ESI9         Baker Tank         Decon Water         03/24/95           20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95           17 E         3         8         ESI9         Baker Tank         Decon Water         03/24/95           18 E         4         1         ESI9         Baker Tank         Decon Water         03/26/95           2 E         4         2         ESI9         Baker Tank         Decon Water         03/24/95           13 E         4         3         ESI9         Baker Tank         Decon Water         03/24/95           15 E         4         4         ESI9         Baker Tank         Decon Water         03/24/95           24 E         4         5         ESI9         Baker Tank         Decon Water         03/24/95           8 E         4         6         ESI9         Baker Tank         Decon Water         03/24/95           19 E         4         7         ESI9         Baker Tank         Decon Water         03/24/95	
23 E         3         5         ESI9         Baker Tank         Decon Water         03/24/95           20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95           17 E         3         8         ESI9         Baker Tank         Decon Water         03/24/95           18 E         4         1         ESI9         Baker Tank         Decon Solids/Water         03/26/95           2 E         4         2         ESI9         Baker Tank         Decon Water         03/24/95           13 E         4         3         ESI9         Baker Tank         Decon Water         03/24/95           15 E         4         4         ESI9         Baker Tank         Decon Water         03/24/95           24 E         4         5         ESI9         Baker Tank         Decon Water         03/24/95           8 E         4         6         ESI9         Baker Tank         Decon Water         03/24/95           19 E         4         7         ESI9         Baker Tank         Decon Water         03/24/95	
20 E         3         7         ESI9         Baker Tank         Decon Water         03/24/95           17 E         3         8         ESI9         Baker Tank         Decon Water         03/24/95           18 E         4         1         ESI9         Baker Tank         Decon Solids/Water         03/26/95           2 E         4         2         ESI9         Baker Tank         Decon Water         03/24/95           13 E         4         3         ESI9         Baker Tank         Decon Water         03/24/95           15 E         4         4         ESI9         Baker Tank         Decon Water         03/24/95           24 E         4         5         ESI9         Baker Tank         Decon Water         03/24/95           8 E         4         6         ESI9         Baker Tank         Decon Water         03/24/95           19 E         4         7         ESI9         Baker Tank         Decon Water         03/24/95	
17 E         3         8         ESI9         Baker Tank         Decon Water         03/24/95           18 E         4         1         ESI9         Baker Tank         Decon Solids/Water         03/26/95           2 E         4         2         ESI9         Baker Tank         Decon Water         03/24/95           13 E         4         3         ESI9         Baker Tank         Decon Water         03/24/95           15 E         4         4         ESI9         Baker Tank         Decon Water         03/24/95           24 E         4         5         ESI9         Baker Tank         Decon Water         03/24/95           8 E         4         6         ESI9         Baker Tank         Decon Water         03/24/95           19 E         4         7         ESI9         Baker Tank         Decon Water         03/24/95	
18 E       4       1       ESI9       Baker Tank       Decon Solids/Water       03/26/95         2 E       4       2       ESI9       Baker Tank       Decon Water       03/24/95         13 E       4       3       ESI9       Baker Tank       Decon Water       03/24/95         15 E       4       4       ESI9       Baker Tank       Decon Water       03/24/95         24 E       4       5       ESI9       Baker Tank       Decon Water       03/24/95         8 E       4       6       ESI9       Baker Tank       Decon Water       03/24/95         19 E       4       7       ESI9       Baker Tank       Decon Water       03/24/95	
2 E       4       2       ESI9       Baker Tank       Decon Water       03/24/95         13 E       4       3       ESI9       Baker Tank       Decon Water       03/24/95         15 E       4       4       ESI9       Baker Tank       Decon Water       03/24/95         24 E       4       5       ESI9       Baker Tank       Decon Water       03/24/95         8 E       4       6       ESI9       Baker Tank       Decon Water       03/24/95         19 E       4       7       ESI9       Baker Tank       Decon Water       03/24/95	
13 E       4       3       ESI9       Baker Tank       Decon Water       03/24/95         15 E       4       4       ESI9       Baker Tank       Decon Water       03/24/95         24 E       4       5       ESI9       Baker Tank       Decon Water       03/24/95         8 E       4       6       ESI9       Baker Tank       Decon Water       03/24/95         19 E       4       7       ESI9       Baker Tank       Decon Water       03/24/95	
15 E     4     4     ESI9     Baker Tank     Decon Water     03/24/95       24 E     4     5     ESI9     Baker Tank     Decon Water     03/24/95       8 E     4     6     ESI9     Baker Tank     Decon Water     03/24/95       19 E     4     7     ESI9     Baker Tank     Decon Water     03/24/95	
24 E     4     5     ESI9     Baker Tank     Decon Water     03/24/95       8 E     4     6     ESI9     Baker Tank     Decon Water     03/24/95       19 E     4     7     ESI9     Baker Tank     Decon Water     03/24/95	
8 E         4         6         ESI9         Baker Tank         Decon Water         03/24/95           19 E         4         7         ESI9         Baker Tank         Decon Water         03/24/95	
19 E 4 7 ESI9 Baker Tank Decon Water 03/24/95	
2 E 4 8 ESI9 Baker Tank Decon Water 03/24/95	
11 G 5 3 OU3 YWRGW-002D Soil Cuttings 06/08/95	
2 U 5 5 AOC3 PPLGW-013D Soil Cuttings 06/24/95	
4 Z 5 6 OU2 RWRGW-003D Soil Cuttings 08/26/95	
6 Z 5 7 OU2 RWRGW-003D Soil Cuttings 08/26/95	
10 K 5 8 AOC3 PPLGW-012D Soil Cuttings 06/20/95	
1 I 5 9 OU3 SAAGW-001D Soil Cuttings 06/10/95	
7 Z 5 10 OU2 RWRGW-003D Soil Cuttings 08/26/95	
8 K 5 11 AOC3 PPLGW-012D Soil Cuttings 06/20/95	
13 G 6 1 OU3 YWRGW-002D Soil Cuttings 06/08/95	
6 G 6 2 OU3 YWRGW-002D Soil Cuttings 06/06/95	
1 G 6 3 OU3 YWRGW-002D Soil Cuttings 06/06/95	
10 G 6 4 OU3 YWRGW-002D Soil Cuttings 06/07/95	
5 G 6 5 OU3 YWRGW-002D Soil Cuttings 06/06/95	
1 AA 6 6 OU2 RWRGW-003 Soil Cuttings 08/27/95	
5 Z 6 7 OU2 RWRGW-003D Soil Cuttings 08/26/95	
11 K 6 8 AOC3 PPLGW-012D Soil Cuttings 06/23/95	
2 I 6 9 OU3 SAAGW-001D Soil Cuttings 06/10/95	
1 Y 6 10 OU2 RWRGW-002 Soil Cuttings 08/25/95	***
1 Z 6 11 OU2 RWRGW-003D Soil Cuttings 08/26/95	
104 B 7 1 ESI1 MZAGW-002 Purge Water 03/08/95 Leaker	
3 I 7 2 OU3 SAAGW-001D Soil Cuttings 06/10/95	

Drum ID	Row	Positio	Site	Location	Description	Date	Remarks
7 G	7 .	3	OU3	YWRGW-002D	Soil Cuttings	06/07/95	
7 K	7	4	AOC3	PPLGW-012D	Soil Cuttings	06/20/95	
3 U	7	5	AOC3	PPLGW-013D	Soil Cuttings	06/24/95	
80	7	6	AOC3	PPLGW-008D	Waste Grout	06/21/95	
61	7	7	OU3	SAAGW-001D	Soil Cuttings	06/09/95	
8 U	7	8	AOC3	PPLGW-013D	Soil Cuttings	06/25/95	
4 1	7	9	OU3	SAAGW-001D	Soil Cuttings	06/09/95	
123 D	8	1	ESI1	YWLGW-025	Purge Water	03/07/94	Leaker - Empty Drum
4 G	8	2	OU3	YWRGW-002D	Soil Cuttings	06/06/95	
2 Z	8	3	OU2	RWRGW-003D	Soil Cuttings	08/26/95	
1 V	8	4	OU2	RWRGW-002D	Soil Cuttings	07/05/95	
9 K	8	5	AOC3	PPLGW-012D	Soil Cuttings	06/20/95	
3 Z	8	6	OU2	RWRGW-003D	Soil Cuttings	08/26/95	
3 G	8	7	OU3	YWRGW-002D	Soil Cuttings	06/06/95	
3 K	8	8	AOC3	PPLGW-012D	Soil Cuttings	06/19/95	
5 1	8	9	OU3	SAAGW-001D	Soil Cuttings	06/09/95	
1 M	9	1	AOC3	PPLGW-009D	Soil Cuttings	06/23/95	
1 X	9	2	OU2	RWRGW-004	Soil Cuttings	07/07/95	
Unk 1	9	3			Water		Leaker - Closed Head
5 M	9	4	AOC3	PPLGW-009D	Soil Cuttings	06/23/95	
11 U	9	5	AOC3	PPLGW-013D	Soil Cuttings	06/26/95	
81	9	6	OU3	SAAGW-001D	Soil Cuttings	06/20/95	
2 S	9	7	AOC3	PPLGW-011D	Soil Cuttings	06/21/95	
9 U	9	8	AOC3	PPLGW-013D	Soil Cuttings	06/25/95	
1 R	9	9	AOC3	PPLGW-0111	Soil Cuttings	06/19/95	
2 M	9	10	AOC3	PPLGW-009D	Soil Cuttings	06/23/95	
7 M	10	1	AOC3	PPLGW-009D	Soil Cuttings	06/23/95	
Unk 2	10	2	7000	11 2011-000B	Water	00/20/00	Leaker - Closed Head
1 W	10	3	OU2	RWRGW-004D	Soil Cuttings	07/06/95	Leaker - Glosca Flead
10 S	10	4	AOC3	PPLGW-011D	Soil Cuttings ·	06/21/95	
10 M	10	5	AOC3	PPLGW-009D	Soil Cuttings	06/26/95	
4 S	10	6	AOC3	PPLGW-011D	Soil Cuttings	06/21/95	
10 U	10	7	AOC3	PPLGW-013D	Soil Cuttings	06/25/95	
8 M	10	8	AOC3	PPLGW-009D	Soil Cuttings	06/23/95	
9 M	10	9	AOC3	PPLGW-009D	Soil Cuttings	06/23/95	
6 M	10	10	AOC3	PPLGW-009D	Soil Cuttings	06/23/95	
6 S	11	1	AOC3	PPLGW-011D	Soil Cuttings	06/22/95	
8 S	11	2	AOC3	PPLGW-011D	Soil Cuttings	06/22/95	
5 S	11	3	AOC3	PPLGW-011D	Soil Cuttings	06/22/95	
6 U	11	4	AOC3	PPLGW-013D	Soil Cuttings	06/24/95	
7 U	11	5	AOC3	PPLGW-013D	Soil Cuttings	06/25/95	
4 M	11	6	AOC3	PPLGW-009D	Soil Cuttings	06/23/95	
2 K	11	7	AOC3	PPLGW-012D	Soil Cuttings	06/19/95	
1 K	11	8	AOC3	PPLGW-012D	Soil Cuttings	06/19/95	
4 U	11	9	AOC3	PPLGW-013D	Soil Cuttings	06/25/95	
18	11	10	AOC3	PPLGW-013D	Soil Cuttings	06/21/95	
6 K	12	10	AOC3	PPLGW-011D	Soil Cuttings	06/19/95	
5 K	12		AOC3	PPLGW-012D		06/19/95	
		2			Soil Cuttings		
7 S	12	3	AOC3	PPLGW-011D	Soil Cuttings	06/22/95	
1 T	12	4	AOC3	PPLGW-013	Soil Cuttings	06/22/95	

Drui	m ID	T	Row	Positio	Site	Location	Description	Date	Remarks
3	М	T	12	5	AOC3	PPLGW-009D	Soil Cuttings	06/23/95	
	s	7	12	6	AOC3	PPLGW-011D	Soil Cuttings	06/22/95	
	S	T	12	7	AOC3	PPLGW-011D	Soil Cuttings	06/21/95	
	V	+	12	8	OU2	RWRGW-002D	Soil Cuttings	07/05/95	
	K	7	12	9	AOC3	PPLGW-012D	Soil Cuttings	06/19/95	
5	U	$\dagger$	12	10	AOC3	PPLGW-013D	Soil Cuttings	06/25/95	
	Ū	†	13	1	AOC3	PPLGW-013D	Soil Cuttings	06/24/95	
	BE	7	13	2	ESI9	NAAGW-001D	Soil Cuttings	01/23/96	
	BG	†	13	3	ESI9	PPLGW-014	Soil Cuttings	12/14/95	
	BE	+	13	4	ESI9	AAGW-001/-001	Decon Pad Water	12/20/95	Leaker - Empty
	BA	+	13	5	ESI9	MCYGW-002D	Drilling Mud	12/13/95	
	BD	+	13	6	ESI9	NAAGW-001	Soil Cuttings	12/17/95	
	ВА	7	13	7	ESI9	MCYGW-002D	Drilling Mud	12/13/95	
	BC	+	13	8	ESI9	MCYGW-001	Soil Cuttings	12/13/95	
14		+	13	9	OU3	YWRGW-002D	Soil Cuttings	1995	
Unk		उ	14	1			Soils		Empty?
Unk	_	4	14	2			Soils		Empty?
	BG	Ť	14	3	ESI9	PPLGW-014	Soil Cuttings	12/14/95	
	BE	+	14	4	ESI9	NAAGW-001D	Soil Cuttings	01/23/96	
	BB	+	14	5	ESI9	MCYGW-002	Soil Cuttings	12/13/95	
	BA	+	14	6	ESI9	MCYGW-002D	Drilling Mud	12/13/95	
	BA	+	14	7	ESI9	MCYGW-002D	Soil Cuttings	12/13/95	
	BA	+	14	8	ESI9	MCYGW-002D	Soil Cuttings	12/13/95	
	BA	+	14	9	ESI9	MCYGW-002D	Drilling Mud	12/13/95	
	BE	+	15	1	ESI9	NAAGW-001D	Soil Cuttings	12/17/95	
	BE	╅	15	2	ESI9	NAAGW-001D	Soil Cuttings	12/17/95	
	BC	+	15	3	ESI9	MCYGW-001	Soil Cuttings	12/13/95	
	BA	+	15	4	ESI9	MCYGW-002D	Soil Cuttings	12/13/95	
Unk		5	15	5		MOTOTT COLD	Water	12 .0.00	Leaker - Closed Head
12		4	15	6	OU3	SAAGW-001D	Drilling Water	1995	Leaker - Closed Head
	BA	+	15	7	ESI9	MCYGW-002D	Soil Cuttings	12/13/95	
	BE	+	15	8	ESI9	NAAGW-001D	Drilling Mud	01/20/96	
	BE	+	15	9	ESI9	NAAGW-001D	Drilling Mud	01/20/96	
	BD	+	16	1	ESI9	NAAGW-001D	Soil Cuttings	12/11/95	
	BE	+	16	2	ESI9	NAAGW-001D	Soil Cuttings	12/16/95	
	BA	+	16	3	ESI9	MCYGW-002D	Soil Cuttings	12/13/95	
Unk		6	16	4		MIGTOW GOZD	Soils	127.0700	_
11		4	16	5	OU3	SAAGW-001D	Drilling Water	1995	Possible Leaker
Unk	<del> </del>	ᅱ	16	6		377.377.0012	Water		Possible Leaker
	BB	+	16	7	ESI9	MCYGW-002	Soil Cuttings	12/13/95	
	BE	$\dashv$	16	8	ESI9	NAAGW-001D	Drilling Mud	01/23/96	
	BE	+	16	9	ESI9	NAAGW-001D	Soil Cuttings	12/17/95	
	BE	+	17	1	ESI9	NAAGW-001D	Drilling Mud	01/20/96	
	BE	+	17	2	ESI9	NAAGW-001D	Soil Cuttings	12/17/95	
	BD	$\dashv$	17	3	ESI9	NAAGW-001D	Soil Cuttings	12/11/95	
	BD	+	17	4	ESI9	NAAGW-001D	Soil Cuttings	12/11/95	
	BD	+	17	5	ESI9	NAAGW-001D	Soil Cuttings	12/11/95	
		+			ESI9			12/17/95	
	BE	$\dashv$	17	6		NAAGW-001D	Soil Cuttings		
	BD	4	17	7	ESI9	NAAGW-001D	Drilling Mud	12/14/95	
3	BG	ı	17	8	ESI9	PPLGW-014	Drilling Mud	01/27/96	

Dru	m ID	Row	Positio	Site	Location	Description	Date	Remarks
16	BE	18	2	ESI9	NAAGW-001D	Soil Cuttings	01/24/96	
5	BD	18	3	ESI9	NAAGW-001D	Soil Cuttings	12/16/95	
9	1	18	4	OU3	NAAGW-001	Soil Cuttings	12/15/95	
2	BE	18	5	ESI9	NAAGW-001D	Soil Cuttings	12/16/95	
	BE	18	6	ESI9	NAAGW-001D	Soil Cuttings	12/12/95	
2.	ВВ	18	7	ESI9	MCYGW-002	Soil Cuttings	12/13/95	
2	BG	18	8	ESI9	PPLGW-014	Soil Cuttings	12/14/95	
1	BG	19	1	ESI9	PPLGW-014	Soil Cuttings	12/14/95	
1	BF	19	2	ESI9	SELGW-005	Soil Cuttings	12/13/95	
Unk	8	19	3			Water		Possible Leaker
1	BC	19	4	ESI9	MCYGW-001	Soil Cuttings	12/13/95	
Unk	9	19	5			Water		Possible Leaker
Unk	10	19	6			Water		Possible Leaker
16	G	19	7	OU3	YWRGW-002D	Drilling Water	1995	Leaker - Empty Drum
3	V	20	1	OU2		Soils	Jul-95	· · · · · · · · · · · · · · · · · · ·
	V	20	2	OU2		Water	Jul-95	
1	1	20	3	OU3	SAAGW-001D	Soil Cuttings	06/10/95	
1	BA	20	4	ESI9	MCYGW-002D	Drilling Mud	12/13/95	<u>, , , , , , , , , , , , , , , , , , , </u>
Unk	11	20	5			Water		Leaker - Empty Drum
Unk	23	20	6			Soils		
15		20	7	OU3	YWRGW-002D	Drilling Water	1995	
12		20	8	OU3	YWRGW-002D	Soil Cuttings	06/08/95	
18		21	1	OU3	YWRGW-002D	Soil Cuttings	06/11/95	
	G	21	2	OU3	YWRGW-002D	Soil Cuttings	06/06/95	
	H	21	3	OU3	YWRGW-002	Soil Cuttings	06/09/95	
	G	22	1	OU3	YWRGW-002D	Soil Cuttings	06/11/95	
	G	22	2	OU3	YWRGW-002D	Soil Cuttings	06/07/95	
	ō	22	3	AOC3	PPLGW-008D	Soil Cuttings	06/19/95	
9		22	4	OU3	YWRGW-002D	Soil Cuttings	06/07/95	
40		23	1	OU1	TNTGW-014	Purge Water	11/13/94	
· 52		23	2	OU1	TNTLW-006	Purge Water	11/16/94	
None		23	3	SLTMP	PPLGW-012D	Purge Water	04/18/97	
12	77	24	1	OU3	YWRMW-001A	Decon water	06/12/96	
224		24	2	OU1/OU9		Decon Water	1993	
None		24	3	SLTMP	PPLGW-012D	Purge Water	04/18/97	
	ZZ	25	1	OU3	YWRMW-001A	Development Water	06/12/96	
	ZZ	25	2	OU3	YWRMW-001A	Development Water	06/12/96	
	ZZ	25	3	OU3	YWRMW-001A	Development Water	06/12/96	
	ZZ.	26	1	OU3	YWRMW-001A	Development Water	06/12/96	
	<u></u> Z	26	2	OU2	RWRGW-03D	Soil Cuttings	08/26/95	
	<u>–</u> ZZ	26	3	OU3	YWRMW-001A	Development Water	06/12/96	
NGD	<del></del>	27	1	ESI2	PASGW-007	Purge Water		Possible Leaker
NGD		27	2	ESI2	PASGW-007	Purge Water		
NGD		27	3	ESI2	PASGW-007	Purge Water		Possible Leaker
113	D	27	4	ESI2	PASGW-001	Soil Cuttings	02/28/95	
	ZZ	27	5	OU3	YWRMW-001A	Soil Cuttings	06/09/96	
	ZZ	27	6	OU3	YWRMW-001A	Decon water	06/12/96	
2		27	7	OU2 .	RWRGW-03D	Soil Cuttings	08/26/95	
	ZZ	27	8	OU3	YWRMW-001A	Decon Pad	06/12/96	
13	<u></u>	28	1	ESI2	PASGW-007	Purge Water		Possible Leaker

Drut	m II	D	Row	Positio	Site	Location	Description	Date	Remarks
NGD			28	2	ESI2	PASGW-007	Purge Water	03/12/95	
NGD			28	3	ESI2	PASGW-007	Purge Water	03/09/95	
NGD			28	4	ESI2	PASGW-007	Purge Water		
116	D		28	5	ESI2	PASGW-001	Purge Water	02/28/95	Leaker - Empty Drum
	ZZ.	_	28	6	OU3	YWRMW-001A	Development Water	06/12/96	
	ZZ		28	7	OU3	YWRMW-001A	Soil Cuttings	06/08/96	
10			28	8	OU3	YWRMW-001A	Development Water	06/12/96	
546			29	1	OU11		Purge Water	02/94	
154			29	2	OU1	PPLLW-003D	Waste Grout	10/11/93	
15	_		29	3	OU8		Lab Waste	11/12/93	
158		$\neg$	29	4	OU1	RMFLW-001	Waste Grout	11/02/93	***************************************
152			29	5	OU1/OU9	Alliance	Diesel Fuel	10/93	
47		$\neg$	29	6	OU1		Soil Cuttings	1993	
179		$\neg$	30	1	OU1	TNTLW-006D	Soil Cuttings	10/18/93	
441			30	2	OU8		Lab Waste	11/16/93	
75			30	3	OU9		Soil Cuttings & Water		Rotasonic Spoils
171		$\dashv$	30	4	OU1/OU9		PPE	10/25/93	
45			30	5	OU1	TNTLW-005D	Soil Cuttings	10/11/93	
Unk		12	30	6			Soils		
221	Ā		31	1	OU8		Lab Waste	10/93	
297		$\dashv$	31	2	OU1	PPLLW-003D	Purge Water	10/93	
280			31	3	OU1	RWLLW-004D	Soil Cuttings	10/93	
111	_		31	4	OU1/OU9		Waste Antifreeze	02/94	
464	_	$\neg$	31	5	OU11	SELGW-003	Purge Water	02/25/94	
459	$\overline{}$	$\neg$	31	6	OU9	YWLGW-025D	Purge Water	09/29/93	
302		$\neg$	32	1	OU1	YWLGW-025D	Purge Water	10/18/93	
84			32	2	OU1		Soil Cuttings	1993	
465		$\neg$	32	3	OU11	SELGW-003	Purge Water	02/25/94	
432		$\neg$	32	4	OU1/OU9		Plastic Waste	11/26/93	
474			32	5	OU11	SELGW-004D	Purge Water		Possible Leaker
548		$\neg$	32	6	OU8		Lab Waste	02/25/94	
9		$\neg$	33	1	OU11	SELGW-002	Purge Water		Leaker - Empty Drum
78	_	_	33	2	OU1	RMFLW-001	Soil Cuttings		Emptied 7/27/96
26		$\neg$	34	1	OU1/OU9		Lab Waste (Filters)	12/17/93	
Unk	-	13	35	1			Soils	1 111	
Unk		14	35	2			Water		
Unk		15	35	3			Empty		
Unk		16	35	4			Empty		
545	Ā		35	5	OU11		Purge Water	02/94	Leaker - Empty Drum
Unk		17	36	2			Water		
10	I		36	3	OU3	SAAGW-001D	Drilling Water	1995	
Unk		18	36	4			Water		Possible Leaker
Unk		19	36	5			Water		Possible Leaker
None			37	1	OU1		Waste Kerosene (10 G)		
103	В		37	3	ESI1	MZAGW-002	Development Water	03/08/95	Leaker - Empty Drum
104		_	38	1	ESI1	MZAGW-002	Development Water	03/08/95	
92			38	2	OU10		Decon Water	01/19/95	
91			38	3	OU10		Decon Water	01/19/95	
Unk		20	39	2			Water		
37	В		39	3	OU5	Site Wide	Decon Water	02/07/95	
	_				000	5.15 TTIGO			

Drui	m ID	Row	Positio	Site	Location	Description	Date	Remarks
30	В	40	2	OU5	Site Wide	PPE	01/17/95	
38		40	3	OU5	Site Wide	Decon Water		Possible Leaker
1	W	41	2	AOCs	Site Wide	Decon Water	04/02/97	
	W	41	3	AOCs	Site Wide	Decon Water	04/01/97	
101		42	1	ESI1	MZAGW-001	Development Water	03/01/95	
	В	42	2	OU5	Site Wide	PPE	01/17/95	
15		43	1	OU6	W21GW-003	Decon Plastic & Water	1994	
Unk	21	43	2			Water		Possible Leaker
82		44	1	OU12	SPHGW-001D	Soil Cuttings	02/26/95	
102		44	2	ESI1	MZAGW-001	Development Water	03/01/95	
84		45	1	OU12	SPHGW-001D	Soil Cuttings	02/28/95	
116		46	1	OU12	SPHGW-001	Decon Pad	03/07/95	
131		47	1	OU12	SPHGW-001	Purge Water	03/24/95	
29		47	2	OU1	RWLGW-026	Purge Water	11/09/94	
33		47	3	OU1	PPLLW-003D	Purge Water	11/10/94	
39		47	4	OU1	PPLLF-005	Purge Water	11/13/94	
30		47	5	0U1	PPLLF-003	Purge Water	11/10/94	
120		47	6	ESI1	RWLGW-026	Purge Water	03/95	
42		48	2	OU1	P13GW-023I	Purge Water	11/15/94	
43		48	3	OU1	P13GW-023I	Purge Water	11/15/94	
37		48	4	ESI4	RWLTR-001	Pieces of Clay Pipe	11/94	
31		48	5	OU1	PPLLW-003D	Purge Water	11/10/94	
119		48	6	ESI1	MZAGW-002	Purge Water	03/22/95	
62		49	2	OU1/OU6	1112 1011-002	Lab Waste	10/30/94	
125		49	3	ESI1	MZAGW-003	Decon Spoils	03/15/95	
108		49	4	ESI1	MZAGW-002	Soil Cuttings	02/26/95	
110		49	5	ESI1	11127011-002	Decon Water	02/27/95	
33		50	1	OU1	PPLLW-003D	Purge Water	11/10/94	
104		50	2	ESI1	11 2277-0000	Lab Waste	02/28/95	
Unk	24	50	3	2011		Soils	02/20/33	
117		50	4	OU12	NPHGW-001	Purge Water	03/21/95	Leaker - Empty Drum
111		50	5	ESI1	11111011-001	Plastic Waste	02/27/95	Leaker - Empty Brum
109		50	6	ESI1		Decon Water	02/27/95	
106		51	2	ESI1	MZAGW-001	Soil Cuttings	02/26/95	
31		51	4	001	PPLLW-003D	Purge Water	11/10/94	
28		51	5	OU1	YWLGW-025	Purge Water	11/08/94	
26		51	6	OU1	TNTGW-036D	Purge Water		Leaker - Empty Drum
118		51	7	ESI1	MZAGW-001	Purge Water		Possible Leaker
36		52	1	006	P07GW-002	Purge Water		Leaker - Empty Drum
107		52	2	ESI1	MZAGW-001	Soil Cuttings		Crushed Drum
30		52	3	OU1	PPLLF-003	Purge Water	11/10/94	Orabiloa Dialli
27		52	4	OU1	TNTGW-036D	Purge Water	11/07/94	
24		52	5	OU1	TNTGW-016	Purge Water	11/07/94	
25		52	6	OU1	TNTGW-036D	Purge Water	11/07/94	
19		52	7	OU1	BGELW-002	Purge Water	10/31/94	
58		53	2	001	TNTGW-005	Purge Water	11/17/94	
16		53		OU1	TNTGW-010			
			3			Purge Water	10/31/94	
14		54	2	OU1	TNTGW-010D	Purge Water	10/30/94	
117		54	3	OU12	NPHGW-002	Purge Water	03/21/95	
17	U	55	1	OU1	BGELW-002	Purge Water	10/31/94	

Drui	m ID	Row	Positio	Site	Location	Description	Date	Remarks
44	D	55	2	OU1	RWLLW-004D	Purge Water	11/15/94	
49	D	55	3	OU1	TNTLW-005D	Purge Water	11/16/94	
50	D	55	4	OU1	TNTLW-005D	Purge Water	11/16/94	
45	D	56	1	OU1	RWLLW-004D	Purge Water	11/15/94	
10	٥	56	2	OU1	BGEGW-007	Purge Water	10/30/94	Leaker - Empty Drum
12	D	56	3	OU1	TNTGW-010D	Purge Water	10/30/94	
18	D	56	4	OU1	TNTGW-015	Purge Water	11/01/94	
47	D	57	1	OU1	TNTLW-005D	Purge Water	11/15/94	
48	D	57	2	OU1	TNTLW-005D	Purge Water	11/16/94	
9	D	57	3	OU1	BGEGW-006	Purge Water	10/29/94	
54	D	. 57	4	OU1	TNTLW-006D	Purge Water	11/17/94	
5	D	57	5	OU1	BGWGW-003	Purge Water	10/28/94	
13	D	57	6	OU1	TNTGW-010D	Purge Water	10/30/94	Leaker - Empty Drum
11	D	58	1	OU1	BGEGW-007	Purge Water	10/30/1995	
55	D	58	2	OU1	TNTLW-006D	Purge Water	11/17/94	
4	D	58	3	OU1	BGWGW-003	Purge Water	10/28/94	
56	D	58	4	OU1	TNTLW-006D	Purge Water	11/17/94	
57	D	58	5	OU1	TNTGW-005	Purge Water	11/17/94	
59	D	58	6	OU1	TNTGW-005	Purge Water	11/17/94	
1	D	59	1	OU1	BGWGW-001	Purge Water	10/28/94	
3	D	59	2	OU1	BGWGW-001	Purge Water		Possible Leaker
Unk	22	59	3			Water		
36		59	4	OU6	P07GW-002	Purge Water	11/12/94	Leaker
	D	60	1	OU1	PPLLF-006	Purge Water	11/13/94	
2		60	2	OU1	BGWGW-001	Purge Water		Leaker - Empty Drum
Unk	25	61	1			Water		Leaker
Unk	26	61	2			Water		
None		61	3	ESI2	ACDGW-001	Waste Grout	02/10/95	
35	D	61	4	OU6	P23GW-004	Purge Water	11/11/94	
10		61	5	ESI4	RWLTR-001	Lab Waste ·	11/15/94	7
440		38A	1	OU8		Lab Waste	12/17/93	
433		38A	2	OU8		Lab Waste - Glass	10/93	
447		38B	1	OU8		Lab Waste	11/12/93	77.
446		38B	2	OU8		Lab Waste - TNT Screen	11/17/93	
	10KB	BT1	1	ESI9	Site Wide	Purge Water	1995	
	10KB	BT1	2	ESI9	Site Wide	Purge Water	1995	
	10KB	BT1	3	ESI9	Site Wide	Purge Water	1995	
	10KB	BT1	4	ESI9	Site Wide	Purge Water	1995	
	10KB	BT1	5	ESI9	Site Wide	Purge Water	1995	
	10KB	BT1	6	ESI9	Site Wide	Purge Water	1995	
	10KB	BT1	7	ESI9	Site Wide	Purge Water	1995	
-	10KB	BT1	8	ESI9	Site Wide	Purge Water	1995	
	10KB	BT2	1	ESI9	Site Wide	Purge Water	1995	
	10KB	BT2	2	ESI9	Site Wide	Purge Water	1995	
	10KB	BT2	3	ESI9	Site Wide	Purge Water	1995	
	10KB	BT2	4	ESI9	Site Wide	Purge Water	1995	
	10KB	BT2	5	ESI9	Site Wide	Purge Water	1995	
	10KB	BT2	6	ESI9	Site Wide	Purge Water	1995	
	10KB	BT2	7	ESI9	Site Wide	Purge Water	1995	
	10KB	BT3	1	ESI9		Purge Water		
24	INKR	B13		E219	Site Wide	Purge vvater	1995	

Dru	m ID	Row	Positio	Site	Location	Description	Date	Remarks
	10KB	BT3		ESI9	Site Wide	Purge Water		
	10KB	BT3	3	ESI9	Site Wide	Purge Water Purge Water	1995 1995	
	10KB	BT3	4	ESI9	Site Wide	Purge Water	1995	
	10KB	BT3	5	ESI9	Site Wide	Purge Water	1995	
	10KB	BT3	6	ESI9	Site Wide	Purge Water	1995	
	10KB	BT3	7	ESI9	Site Wide	Purge Water	1995	
	10KB	BT3	8	ESI9	Site Wide	Purge Water	1995	
	10KB	BT3	9	ESI9	Site Wide	Purge Water	1995	
	10KB	BT4	2	ESI9	Site Wide	Purge Water	1995	
	10KB	BT4	3	ESI9	Site Wide	Purge Water	1995	
	10KB	BT4	4	ESI9	Site Wide	Purge Water	1995	
	10KB	BT4	5	ESI9	Site Wide	Purge Water	1995	· · · · · · · · · · · · · · · · · · ·
			6	ESI9				
	10KB	BT4	7	ESI9	Site Wide	Purge Water	1995 1995	
	10KB	BT4			Site Wide	Purge Water		
	10KB	BT4	8	ESI9	Site Wide	Purge Water	1995	
	10KB	BT4	9	ESI9	Site Wide	Purge Water	1995	
	10KB	BT5	2	ESI9	Site Wide	Purge Water	1995	
	10KB	BT5	3	ESI9	Site Wide	Purge Water	1995	
	10KB	BT5	4	ESI9	Site Wide	Purge Water	1995	
	10KB	BT5	5	ESI9	Site Wide	Purge Water	1995	
	10KB	BT5	6	ESI9	Site Wide	Purge Water	1995	
	10KB	BT5	7	ESI9	Site Wide	Purge Water	1995	
	10KB	BT5	8	ESI9	Site Wide	Purge Water	1995	
	10KB	BT6	2	ESI9	Site Wide	Purge Water	1995	
	10KB	BT6	3	ESI9	Site Wide	Purge Water	1995	
	10KB	BT6	4	ESI9	Site Wide	Purge Water	1995	
	10KB	BT6	5	ESI9	Site Wide	Purge Water	1995	W
	10KB	BT6	6	ESI9	Site Wide	Purge Water	1995	
-	10KB	BT6	7	ESI9	Site Wide	Purge Water	1995	
	10KB	BT6	8	ESI9	Site Wide	Purge Water	1995	
	В	OP		ESI2	ACDGW-001	Soil Cuttings	02/10/95	
38		OP		ESI2	ACDGW-001	Soil Cuttings	02/10/95	
39		OP		ESI2	ACDGW-001	Soil Cuttings	02/10/95	
40		OP		ESI2	ACDGW-001	Soil Cuttings	02/10/95	
41		OP		ESI2	ACDGW-001	Soil Cuttings	02/10/95	
42		OP		ESI2	ACDGW-001	Soil Cuttings	02/10/95	
43	R	OP		ESI2	ACDGW-001	Soil Cuttings	02/10/95	
Unk		OP		1 77.15	MOUGH	Water	1011515	Leaker
1		α	1	LTMP	NPHGW-002	Purge Water	12/15/97	
2		Q	2	LTMP	YWRGW-027D	Purge Water	12/15/97	
3		Q	3	LTMP	YWRGW-027D	Purge Water	12/15/97	
4		Q	4	LTMP	NPHGW-002	Purge Water	12/15/97	
5		Q	5	LTMP	YWRGW-027D	Purge Water	12/15/97	·
6		Q	6	LTMP	YWRGW-027D	Purge Water	12/15/97	
7		Q	7	LTMP	YWRPT-001	Purge Water	12/15/97	
8		Q	8	LTMP	YWRPT-001	Purge Water	12/15/97	
9		Q	9	LTMP	YWRPT-001	Purge Water	12/15/97	
10		Q	10	LTMP	YWRPT-001	Purge Water	12/15/97	
11		Q	11	LTMP	YWRPT-001	Purge Water	12/15/97	
12		Q	12	LTMP	RWRGW-003	Purge Water	12/15/97	

Drum ID	Row	Positio	Site	Location	Description	Date	Remarks
13	Q	13	LTMP	YWRPT-001	Purge Water	12/15/97	
14	Q	14	LTMP	YWRPT-001	Purge Water	12/15/97	
15	Q	15	LTMP	RWLLW-004D	Purge Water	12/15/97	
16	Q	16	LTMP	RWLLW-004D	Purge Water	12/15/97	
17	q	17	LTMP	RWLLW-004D	Purge Water	12/15/97	
18	Q	18	LTMP	RWLGW-026	Purge Water	12/15/97	
19	Q	19	LTMP	P13GW-023I	Purge Water	12/15/97	
20	Q	20	LTMP	RWLLW-004D	Purge Water	12/15/97	
21	Q	21	LTMP	PPLLF-003	Purge Water	12/15/97	
22	Q	22	LTMP	PPLLF-004	Purge Water	12/15/97	
23	Q	23	LTMP	YWLGW-025D	Purge Water	12/15/97	
24	Q	24	LTMP	PPLLF-004	Purge Water	12/15/97	
25	Q	25	LTMP	PPLLF-003	Purge Water	12/15/97	
26	Q	26	LTMP	RWRGW-045	Purge Water	12/15/97	
27	Q	27	LTMP	P13GW-023I	Purge Water	12/15/97	
28	Q	28	LTMP	RWLLW-004D	Purge Water	12/15/97	
29	q	29	LTMP	TNTGW-014	Purge Water	12/15/97	
30	a	30	LTMP	YWRPT-001	Purge Water	12/15/97	
31	Q	31	LTMP	YWLGW-025D	Purge Water	12/15/97	
32	Q	32	LTMP	YWRGW-027	Purge Water	12/15/97	
33	a	33	LTMP	YWRGW-027	Purge Water	12/15/97	
34	Q	34	LTMP	YWRGW-002D	Purge Water	12/15/97	
35	Q	35	LTMP	TNTGW-014	Purge Water	12/15/97	
36	Q	36	LTMP	TNTGW-036D	Purge Water	12/15/97	
37	Q	37	LTMP	TNTGW-036D	Purge Water	12/15/97	
38	Q	38	LTMP	TNTGW-015	Purge Water	12/15/97	
39	Q	39	LTMP	TNTGW-036D	Purge Water	12/15/97	
40	Q	40	LTMP	RWRGW-002	Purge Water	12/15/97	
41	Q	41	LTMP	TNTGW-021	Purge Water	12/15/97	
42	Q	42	LTMP	TNTGW-036D	Purge Water	12/15/97	
· 43	Q	43	LTMP	YWRMW-001A	Purge Water	12/15/97	
44	Q	44	LTMP	YWRGW-002D	Purge Water	12/15/97	
45	Q	45	LTMP	TNTGW-017	Purge Water	12/15/97	
46	Q	46	LTMP	RWRGW-002	Purge Water	12/15/97	
47	Q	47	LTMP	TNTLW-006	Purge Water	12/15/97	
48	q	48	LTMP	TNTLW-006	Purge Water	12/15/97	
49	Q	49	LTMP	RWRGW-046	Purge Water	12/15/97	
50	Q	50	LTMP	RWRGW-046	Purge Water	12/15/97	
51	Q	51	LTMP	RWRGW-031	Purge Water	12/15/97	
52	Q	52	LTMP	RWRPT-001	Purge Water	12/15/97	
53	Q	53	LTMP	RWRPT-001	Purge Water	12/15/97	
54	Q	54	LTMP	RWRGW-047	Purge Water	12/15/97	
55	Q	55	LTMP	RWRGW-047	Purge Water	12/15/97	
56	Q	56	LTMP	RWRGW-030	Purge Water	12/15/97	
57	Q	57	Data Gap	PWSGW-002A	Soil Cuttings	12/15/97	
58	Q	58	Data Gap	PWSGW-002A	Soil Cuttings	12/15/97	
59	Q	59	Data Gap	PWSGW-001	Soil Cuttings	12/15/97	
60	Q	60	Data Gap	PWSGW-001	Soil Cuttings	12/15/97	
61	Q	61	SLTMP	PWSGW-003	Soil Cuttings	12/15/97	
62	Q	62	SLTMP	PWSGW-003	Soil Cuttings	12/15/97	

Drum ID	Row	Positio	Site	Location	Description	Date	Remarks
63	Q	63	SLTMP	PWSGW-003	Soil Cuttings	12/15/97	
64	Q	64	LTMP	BGDGW-006	Purge Water	12/15/97	
65	Q	65	LTMP	BGDGW-003	Purge Water	12/15/97	
66	Q	66	LTMP	BGDGW-006	Purge Water	12/15/97	
67	Q	67	LTMP	BGDGW-006	Purge Water	12/15/97	
68	Q	68	LTMP	BGDGW-004	Purge Water	12/15/97	
69	Q	69	LTMP	BGDGW-004	Purge Water	12/15/97	
70	Q	70	LTMP	BGDGW-005	Purge Water	12/15/97	
71	Q	71	LTMP	BGDGW-005	Purge Water	12/15/97	
72	Q	72	LTMP	BGDGW-007	Purge Water	12/15/97	
73	Q	73	LTMP	BGDGW-007	Purge Water	12/15/97	
74	Q	74	LTMP	BGDGW-008	Purge Water	12/15/97	
75	Q	75	LTMP	BGDGW-008	Purge Water	12/15/97	
76	Q	76	LTMP	PWSGW-002	Purge Water	12/15/97	
77	Q	77	LTMP	BGDGW-001	Purge Water	12/15/97	
78	Q	78	LTMP	PWSGW-002	Purge Water	12/15/97	
79	Q	79	LTMP	PWSGW-002	Purge Water	12/15/97	
80	Q	80	LTMP	PWSGW-002	Purge Water	12/15/97	
81	Q	81	LTMP	PWSGW-002	Purge Water	12/15/97	
82	Q	82	LTMP	PWSGW-003	Purge Water	12/15/97	
83	Q	83	LTMP	PWSGW-003	Purge Water	12/15/97	
84	Q	84	LTMP	PWSGW-002	Purge Water	12/15/97	
85	Q	85	LTMP	PWSGW-003	Purge Water	12/15/97	
86	Q	86	LTMP	PWSGW-003	Purge Water	12/15/97	
87	Q	87	LTMP	PWSGW-003	Purge Water	12/15/97	
88	Q	88	LTMP	PWSGW-001	Purge Water	12/15/97	
89	Q	89	LTMP	PWSGW-003	Purge Water	12/15/97	
90	Q	90	LTMP	PWSGW-003	Purge Water	12/15/97	
91	Q	91	LTMP	PWSGW-001	Purge Water .	12/15/97	
92	Q	92	LTMP	PWSGW-001	Purge Water	12/15/97	
93	Q	93	LTMP	PWSGW-001	Purge Water	12/15/97	
94	Q	94	LTMP	PWSGW-001	Purge Water	12/15/97	
78 B	Q		OU12	NPHGW-002	Soil Cuttings		Emptied July 96
130 D	Q		OU12	NPH Trench	Decon Plastic	03/24/95	

# **ATTACHMENT 2**

PHOTOGRAPHS TAKEN DURING IDW INSPECTION SEPTEMBER 21 – 24, 1998 WEST VIRGINIA ORDNANCE WORKS MASON COUNTY, WEST VIRGINIA



Photograph No. 1.

IDW Staging Area - Looking Northeast from Gate,
September 21, 1998.



Photograph No. 2.

IDW Staging Area - Looking Northeast from Gate,
September 21, 1998.



Photograph No. 3.
IDW Staging Area - Looking Southwest from Quonset
Hut, September 22, 1998.



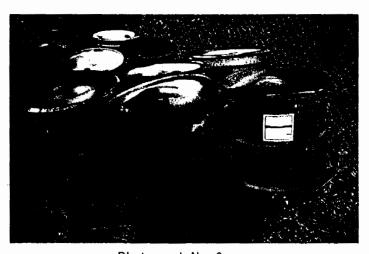
Photograph No. 4.

IDW Staging Area Behind Quonset Hut - Looking
East-Southeast, September 22, 1998.



Photograph No. 5.

Mowing of IDW Staging Area - Looking Northeast from Gate Area, September 22, 1998.



Photograph No. 6.

Drum 107-D and Row No. 52 - Looking North,
September 22, 1998.



Photograph No. 7.
Drums 9-A and 78-A, Row No. 33 - Looking North,
September 22, 1998.



Photograph No. 8.

Drum 16-G and Row No. 19 - Looking North,
September 22, 1998.



Photograph No. 9. Row No. 36 - Looking Southwest, September 22, 1998.

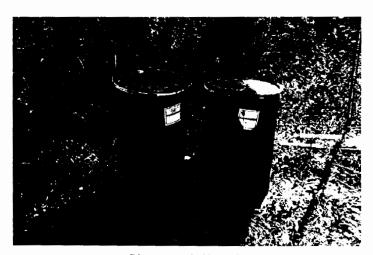


Photograph No. 10.
Row No's 38B and 38A (Lab Waste) - Looking West,
September 22, 1998.



Photograph No. 11.

Drum 13-D and Row No. 56 - Looking North,
September 22, 1998.



Photograph No. 12.
Unidentified Drums, Pos. 1 & 2, Row 61 - Looking East,
September 22, 1998.



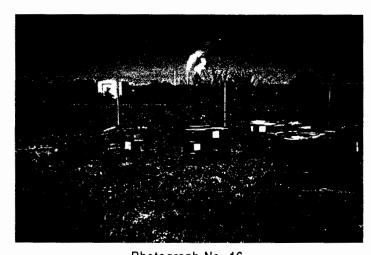
Photograph No. 13. Southeastern Corner of IDW Staging Area, September 24, 1998.



Photograph No. 14.
Rows 15 through 20 - Looking Northwest,
September 24, 1998.



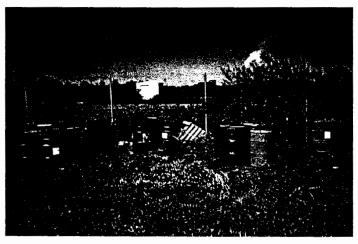
Photograph No. 15.
Rows 19 through 22 - Looking Northwest,
September 24, 1998.



Photograph No. 16. Rows 23 through 28 - Looking Northwest, September 24, 1998.



Photograph No. 17.
Rows 27 through 33 - Looking Northwest,
September 24, 1998.

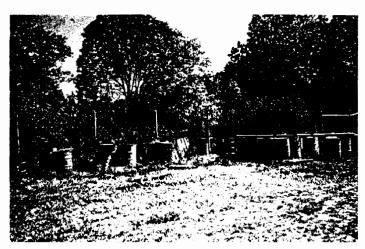


Photograph No. 18.
Rows 31 through 37 - Looking Northwest,
September 24, 1998.



Photograph No. 19.

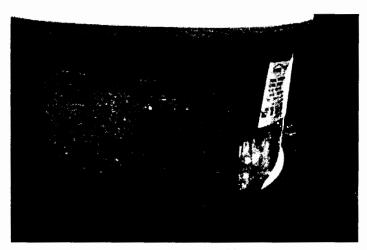
IDW Behind Quonset Hut - Looking Southeast,
September 24, 1998.



Photograph No. 20.
IDW Behind Quonset Hut - Looking East,
September 24, 1998.



Photograph No. 21. Rows 38 through 46 - Looking East, September 24, 1998.



Photograph No. 22. Empty Drum of Unknown Origin (Ammonium Perchlorate - UN 1442) September 24, 1998

NOTE: This drum bears the following markings -

Manufacturer: Kerr-McGee Chemical Corp. 1101 US Highway 93 Apex, NV 89124 702-643-4100

Shipping Data:
Thiokol Corporation
Elkton, MD 21921
PO No. 69544-BK
Item 01-200 Micron Flash Dried with TCP
SPEC: ESRM-17F, CLASS 1, PROCESS A &
MIL-A 192 B, INT. AMD. 1. GRADE C. CLASS 4
KMCC APEX LOT NO. 7306 (MFG 12/95)
052 OF 188 / 250-POUND DRUMS
(28 POUND TARE)



#### DEPARTMENT OF THE ARMY

#### HUNTINGTON DISTRICT, CORPS OF ENGINEERS 502 EIGHTH STREET

#### HUNTINGTON, WEST VIRGINIA 25701-2070

ATTENTION OF:

2 0 00T 100.

Engineering and Construction Division Construction Management and Field Support Branch

Mr. Thomas A. Fisher West Virginia Division of Environmental Protection Office of Waste Management Compliance Assurance and Emergency Response 1356 Hansford Street Charleston, West Virginia 25301-1401

Subject: West Virginia Ordnance Works, Notice of Violation, EPA I.D. Number WVD980713036

Dear Mr. Fisher:

Reference is made to your letter of September 4, 1998 transmitting the Notice of Violation (NOV) and the Compliance Evaluation Inspection (CEI) Report for the subject project and your letter of September 30, 1998 providing comments to the Investigation Derived Waste Plan. Reference is also made to the attached document prepared by the Corps' contractor, International Technology (IT) Corporation.

In response to the NOV, general housekeeping has been performed at the site, such as mowing of the grass and returning overturned drums to their upright position on pallets. The drums have also been inventoried and documentation of drum conditions were noted as you will observe in the enclosed documentation. Drum labels have not been replaced at this time, however, all drums do contain a number which corresponds to the inventory list and location map as contained in the enclosure. Weekly inspections have been initiated and will continue as long as the drums are on site.

As outlined in the attached document, the removal of the investigation derived waste (IDW) is in accordance with your comments provided by your letter of September 30, 1998 with one exception. We have previously concluded after consultation with WVDEP, that the decontamination water on site was classified as a non-hazardous waste, rather than an F-Listed, Hazardous Waste. Methanol was used in the decontamination process at WVOW, however, it was used in very small quantities in combination with much larger quantities of water.

Additionally, as described in the IDW plan, (Paragraph 4.3.2.2 and Table 4-1), the decontamination fluids containing the methanol were placed in stainless steel bowls for on-site evaporation prior to addition to the drums. Thus, the resulting waste stream from the decontamination process is predominately water, which does not exhibit the characteristic of ignitability and should not be classified as an F003 waste. Because the decontamination water does not exhibit the characteristic of ignitability, we propose the decontamination water be added to and managed in the same manner as the purge and development water.

During the week of October 26, 1998 composite sampling will be performed at the site which is in accordance with your letter approving the consolidation and disposal of drums. addition, disposal plans for "lab wastes" will be finalized at that time. All IDW should be removed from the site by the end of November, 1998.

Your letter of September 30, 1998 requested copies of all documents relating to the off-site disposal of wastes that have occurred to date from the site operations. Approximately 900 drums of IDW generated at the site were disposed on-site in 1996 in accordance with the disposal plans approved by WVDEP Since these IDW were non-hazardous and disposed of on-site, manifests were not prepared. Since that time, one drum of soil cuttings generated at ESI-3 was disposed of offsite as a hazardous waste. A copy of the manifest and supporting documentation is enclosed.

I hope that we have addressed your concerns at the site and upon implementation of our plan, the conditions outlined in the NOV will be rectified. If you have any questions or comments regarding the proposed actions, please contact Mr. Richard Meadows at (304) 529-5388.

Sincerely,

Dana Robertson

Colonel, Corps of Engineers

District Engineer

Enclosures Copies Furnished: --> Carletta Parlin, USEPA H. Michael Dorsey, WVDEP David J. Cunningham, WVDEP Pete Costello, WVDEP



#### **DIVISION OF ENVIRONMENTAL PROTECTION**

Cecil H. Underwood GOVERNOR 1356 Hansford Street Charleston, WV 25301-1401

MICHAEL P. MIANO DIRECTOR

September 4, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rick Meadows, District Environmental Engineer U.S. Army Corps of Engineers Clean up of WV Ordnance Works 502 8th Street Huntington, WV 25701

Dear Mr. Meadows:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI) Report** completed by representatives of the Chief of the Office of Waste Management. This report is based on the inspection conducted on August 19, 1998.

Please refer to the **Notice of Violation** for those violations discovered during the course of this inspection. As a result of those violations, this report is being referred for the following action:

	Correct noted violations
X	Notice of Violation
	Civil and Administrative Penalty (CAP) Enforcement Referral

A copy of this report is being transmitted to the United States Environmental Protection Agency (U.S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation. If you have any questions concerning the inspection or the attached report, please to contact Inspector David J. Cunningham at (304) 558-5989.

Sincerely,

Thomas A. Fisher, Inspector Supervisor

Shows a. fil

Compliance Assurance and Emergency Response

TAF/kw

CC:

Carletta Parlin, U.S. EPA Region III Inspector David J. Cunningham

File



#### **DIVISION OF ENVIRONMENTAL PROTECTION**

CECIL H. UNDERWOOD
GOVERNOR

### Office of Waste Management 1356 Hansford Street Charleston, WV 25301-1401

MICHAEL P. MIANO DIRECTOR

#### **NOTICE OF VIOLATION**

DATE: August 19, 1998

TIME: 1040

ISSUED TO: U.S. Army Corps. Of Engineers - Clean up of WV Ordnance Works

EPA I.D.#: WVD980713036

FACILITY MAILING ADDRESS: 502 8th Street, Huntington, WV 2570

FACILITY REPRESENTATIVE: Rick Meadows - District Environmental Engineer

On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or Permit issued pursuant to §22-18. During that inspection the following violation(s) were noted:

- 1. A. (Regulation) 40 CFR Part 262.11
  - B. (Facts) Facility failed to make a proper hazardous waste determination on all wastes generated.
- 2. A. 40 CFR Part 262.32
  - B. Facility failed to properly mark all containers of waste.
- 3. A. 40 CFR Part Subpart I Part 265.171
  - B. Facility failed to address the containers in poor condition.

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions:

You must comply with the above-cited section(s) of the Regulations. It is recommended that you complete the following actions within 30 days of receipt of this Notice:

- Immediately start a process to evaluate and make proper hazardous waste determinations on all possible hazardous wastes.
- Immediately make inventory and mark all containers of hazardous waste with proper wording and labels.
- 3. Immediately start a program to address all containers in poor condition.

Document your compliance by writing to the Chief, Office of Waste Management, 1356 Hansford Street, Charleston, WV 25301 and send a photocopy or facsimile of that correspondence to this inspector.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §22-18-17.

District Phone: (304) 558-5989 Issued by: David Cunningham

District Fax: (304) 558-0256 Title: Environmental Inspector



#### **DIVISION OF ENVIRONMENTAL PROTECTION**

CECIL H. UNDERWOOD
GOVERNOR

Office of Waste Management 1356 Hansford Street Charleston, WV 25301-1401

MICHAEL P. MIANO DIRECTOR

#### **NOTICE OF VIOLATION**

DATE: August 19, 1998

TIME: 1040 hours

ISSUED TO: U.S. Army Corps of Engineers - Clean up of WV Ordnance Works

EPA I.D.#: WVD980713036

FACILITY MAILING ADDRESS: 502 8th Street, Huntington, WV 25701

FACILITY REPRESENTATIVE: Rick Meadows - District Environmental Engineer

On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or Permit issued pursuant to §22-18. During that inspection the following violation(s) were noted:

- 1. A. (Regulation) 40 CFR Part 265.31
  - B. (Facts) Facility failed to operate in a manner to prevent the possibility of sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which may cause harm to human health or the environment.
- A. 40 CFR Part 265.15
  - B. Facility failed to conduct adequate inspections of the site to check for deterioration and discharges which may lead to releases of hazardous waste constituents to the environment.
- 3. A. 40 CFR Subpart I Part 265.174
  - B. Facility failed to conduct inspections where containers are stored, at least weekly, for leaks and deterioration.

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions within 30 days of receipt of this Notice:

- 1. Immediately start a program to assess the containers on site and remove and properly dispose of them.
- Immediately set up a program to start conducting proper inspection at this site.
- Immediately start conducting weekly inspections of the container storage area.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §22-18-17.

District Phone: (304) 558-5989 Issued by: David Cunningham

District Fax: (304) 558-0256 Title: Environmental Inspector

#### **COMPLIANCE EVALUATION INSPECTION**

RE: U.S. Army Corps of Engineers - Clean up WV Ordnance Works

**McClintic Wildlife Station** 

Pt. Pleasant, WV

EPA Identification Number: WVD980713036

DATE INSPECTED: August 19, 1998

INSPECTED BY: Dave Cunningham, WV DEP/OWM

Tom Fisher, WV DEP/OWM Pete Costello, WV DEP/OWM

REPORT BY: Dave Cunningham

On August 19, 1998 at approximately 1040 hours, the above referenced West Virginia Division of Environmental Protection Office of Waste Management employees arrived at the McClintic Wildlife Area and more specifically the site of the storage and treatment of materials generated in the clean up of the WV Ordnance Works. Upon our arrival we were met by Mr. Frank Albert and Mr. Steve Thompson, Environmental Engineers with the U.S. Army Corps of Engineers, Huntington District. We introduced ourselves to these gentlemen and advised them of the purpose of our visit.

Mr. Thompson advised us that all of the soil and liquid wastes that had been generated during the drilling and development of the wells at this site, as well as any other investigative wastes, had been drummed up and stored inside a locked fenced area. The fenced area is the office and storage area for the environmental consultants, International Technologies. We asked Mr. Thompson and Mr. Albert if they had any records of analysis or hazardous waste shipping manifests generated as part of this project. They advised that they did not think that these records were on site, but they were probably at their offices at Huntington. They further advised that there had been one shipment of approximately 900 drums removed from this fenced area last year.

We immediately proceeded to the fenced storage area to conduct our inspection. Upon arrival here we found that there were approximately 300 to 400 metal 55 gallon drums sitting around the building at this site. These drums were all sitting outside with no cover or protection afforded them. All of the drums were suffering from rust and deterioration. Many of the drums were bulging on the

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tops and bottoms from freezing, and several of them had fallen over because of this and the contents had leaked out onto the ground. Many of the drums were sitting on wooden pallets, but because of the amount of time that they had been sitting out in the elements, some of the pallets had rotted away allowing the drums on them to fall over. High weeds and brush had overtaken the storage area making inspection of the drums difficult.

Many of the drums that we looked at were dated 1993, even more of them were dated 1994, with the remainder 1995, 1996, 1997. The largest percentage of these drums was labeled "Investigative Waste"; however, there were several drums that were labeled as various other waste streams. Of these other waste streams, the ones that were of the most concern and would appear to be RCRA violations were as follows: One drum labeled "Lab Waste - Sample Prep 10-30-94 this drum was empty and had apparently leaked out due to rust holes. One drum labeled "Sample Waste Bottles - Lab Waste Including Preservatives 11-15-93". Two drums labeled "Waste Glass TNT Screenings 11-13-93". There were also seven yellow overpack drums with no labeling or any type of indication of what was in them. (We were told later by Mr. Albert and Mr. Thompson that they thought that last year when they disposed of part of the drums that were stored here, there were seven "leakers" placed in these overpacks.)

During this walk through we found at least 6 drums that had fallen over and most or all of the contents had leaked out onto the ground. Photos were taken of the area showing pertinent facts of the conditions that we found.

We also checked inside of the building and found hundreds of samples jars (4 ounce, 8 ounce, and 16 ounce) full of soil samples. These were stacked along both the east and west walls of the structure.

Once we had completed the inspection of this site we advised Mr. Albert and Mr. Thompson

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approval to have the situation taken care of.

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of our findings. We advised that the management of these drums was very poor and that all but the seven overpack drums showed severe signs of rust and deterioration. We pointed out the "Lab Waste", "TNT Screening", and "UNK" drums, and told them that there would probably be RCRA violations associated with this inspection. Both men apologized for the problems created by allowing this many drums to accumulate in an area uncovered to the elements. They told us that they had tried to get attention to the problems, and because of circumstances beyond their control, could not get

This completed our inspection, so we thanked Mr. Albert and Mr. Thompson for their help and cooperation and departed the site at approximately 1225 hours.

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#### **COMPLIANCE EVALUATION**

- 1. Facility failed to make a proper hazardous waste determination on wastes generated, in violation of 40 CFR Part 262.11.
- 2. Facility failed to properly mark all containers of waste (the 6 or 7 containers marked "UNK"), in violation of 40 CFR Part 262.32.
- 3. Facility failed to address the containers in poor condition in violation of 40 CFR Subpart I

  Part 265.171.
- Facility failed to conduct inspections where containers are stored, at least weekly, looking for leaks and deterioration caused by corrosion or other factors in violation of 40 CFR Subpart I Part 265.174.
- 5. Facility failed to operate in a manner to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which would threaten human health or the environment in violation of 40 CFR Part 265.31.
- 6. Facility failed to inspect the facility for malfunctions and deteriorations, operator errors, and discharges which may be causing or may lead to a release of hazardous waste constituents to the environment etc., in violation of 40 CFR Part 265.15 et al.